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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

10 IN RE: UBER TECHNOLOGIES, INC.,
11 PASSENGER SEXUAL ASSAULT
12 LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

JURY TRIAL DEMANDED

13 This Document Relates to:
14 *Jane Doe QLF 001 v. Uber Technologies,*
Inc., et al.; C.A. No. 3:24-cv-08783-CRB

15 **AMENDED SHORT-FORM COMPLAINT AND DEMAND FOR JURY TRIAL**

16 The Plaintiff named below files this *Amended Short-Form Complaint and Demand for Jury*
17 *Trial* against Defendants named below by and through the undersigned counsel. Plaintiff
18 incorporates by reference the allegations contained in *Plaintiffs' Master Long-Form Complaint* in
19 *In Re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, MDL No. 3084, in the United
20 States District Court for the Northern District of California. Plaintiff files this *Amended Short-Form*
21 *Complaint* as permitted by Case Management Order No. 11 of this Court.

22 Plaintiff selects and indicates by checking-off where requested, the Parties and Causes of
23 Actions specific to this case.

24 Plaintiff, by and through her undersigned counsel, alleges as follows:
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I. DESIGNATED FORUM¹

1. Identify the Federal District Court in which the Plaintiff would have filed in the absence of direct filing:

United States District Court, Northern District of California.

(“Transferee District Court”)

II. IDENTIFICATION OF PARTIES

A. PLAINTIFF

1. Injured Plaintiff: Name of the individual who alleges they were sexually assaulted, battered, harassed, or otherwise attacked by an Uber driver with whom they were paired while using the Uber platform:

Jane Doe QLF 001

(“Plaintiff”).

2. At the time of the filing of this *Amended Short-Form Complaint*, Plaintiff resides at: Fort Worth, Tarrant County, Texas.

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3. Not applicable.

B. DEFENDANT(S)

1. Plaintiff names the following Defendants in this action.

☒ UBER TECHNOLOGIES, INC.;²

☒ RASIER, LLC;³

¹ See Pretrial Order No. 6, at II(C) (ECF No. 177).

² Delaware corporation with a principal place of business in California.

³ A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

☒ RASIER-CA, LLC;⁴

☐ OTHER (specify): _____. This defendant's residence is in (specify state): _____.

C. RIDE INFORMATION

1. The Plaintiff was sexually assaulted, harassed, battered, or otherwise attacked by an Uber driver in connection with a ride facilitated on the Uber platform in Tarrant County, Texas on June 9, 2020.

2. The Plaintiff WAS NOT the account holder of the Uber account used to request the relevant ride.

3. The Plaintiff provides the following additional information about the ride:

[PLEASE SELECT/COMPLETE ONE]

☒ The Plaintiff hereby incorporates Plaintiff's disclosure of ride information produced pursuant to Pretrial Order No. 5 ¶ 4 on December 19, 2024, and any amendments or supplements thereto.

☐ The origin of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The requested destination of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The driver was named [DRIVER NAME].

III. CAUSES OF ACTION ASSERTED

1. The Causes of Action asserted in the *Plaintiffs' Master Long-Form Complaint*, and the allegations with regard thereto in the *Plaintiffs' Master Long-Form Complaint*, are adopted in this *Amended Short-Form Complaint* by reference, except that Plaintiff opts out of and excludes the causes of action specified below:

⁴ A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

Check any EXCLUDED causes of action	Cause of Action Number	Cause of Action
<input type="checkbox"/>	I	NEGLIGENCE (including Negligent Hiring, Retention, Supervision, and Entrustment)
<input type="checkbox"/>	II	FRAUD AND MISREPRESENTATION
<input type="checkbox"/>	III	NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
<input type="checkbox"/>	IV	COMMON CARRIER'S NON-DELEGABLE DUTY TO PROVIDE SAFE TRANSPORTATION ⁵
<input type="checkbox"/>	V	OTHER NON-DELEGABLE DUTIES TO PROVIDE SAFE TRANSPORTATION ⁶
<input type="checkbox"/>	VI	VICARIOUS LIABILITY FOR DRIVERS' TORTS - EMPLOYEE
<input type="checkbox"/>	VII	VICARIOUS LIABILITY FOR DRIVERS' TORTS - APPARENT AGENCY
<input type="checkbox"/>	VIII	VICARIOUS LIABILITY FOR DRIVERS' TORTS - RATIFICATION
<input type="checkbox"/>	IX	VICARIOUS LIABILITY FOR DRIVERS' TORTS - Cal. Public Utilities Code § 535
<input type="checkbox"/>	X	STRICT PRODUCTS LIABILITY - DESIGN DEFECT
<input type="checkbox"/>	XI	STRICT PRODUCTS LIABILITY - FAILURE TO WARN
<input type="checkbox"/>	XII	STRICT PRODUCTS LIABILITY - PRODUCT LIABILITY ACTS
<input type="checkbox"/>	XIII	UNFAIR COMPETITION LAW - Cal. Bus. & Prof. Code § 17200 et seq.

⁵ This claim is pleaded in the *Plaintiffs' Master Long-Form Complaint* under the laws of every state **except: Arizona, Colorado, District of Columbia, Illinois** (for incidents prior to August 11, 2023), **Michigan, Montana** (for incidents prior to April 23, 2023), **New York, Pennsylvania, Wisconsin, and Wyoming.**

⁶ This claim is pleaded in *Plaintiffs' Master Long-Form Complaint* under the laws of every state **except: District of Columbia, Michigan, New York, Pennsylvania.**

1 These claims are asserted subject to the Court's rulings, including, but not limited to, the order dated
2 August 15, 2024 (Doc. 1044), and any subsequent pleadings of the parties and/or orders of the
3 Court.

4 **IV. ADDITIONAL CAUSES OF ACTION AND/OR ALLEGATIONS**

5 **NOTE**

6 If Plaintiff wants to allege additional Cause(s) of Action other those selected in paragraph __, the
7 specific facts supporting any such additional Cause(s) of Action, must be pled in a manner
8 complying with the requirements of the Federal Rules of Civil Procedure (see paragraph __). In
9 doing so you may attach additional pages to this Amended Short-Form Complaint.

- 10 1. Plaintiff asserts the following additional theories against the Defendants designated
11 in paragraph __ above:

12 None at this time.

- 13 2. If Plaintiff has additional factual allegations not set forth in *Plaintiffs' Master*
14 *Long-Form Complaint*, they may be set forth below or in additional pages:

15 None at this time.

16 **WHEREFORE**, Plaintiff prays for relief and judgment against Defendants for economic and
17 non-economic compensatory and punitive and exemplary damages, together with interest, costs of
18 suit, attorneys' fees, and all such other relief as the Court deems proper, and such further relief as
19 the Court deems equitable and just, and as set forth in *Plaintiffs' Master Long-Form Complaint*.

20 **JURY DEMAND**

21 Plaintiff hereby demands a trial by jury as to all claims in this action.
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1 Dated: January 29, 2025

Respectfully submitted,

2 By: /s/ M. Kevin Queenan

3 M. Kevin Queenan, TX SBN 16427150

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4 Carlos Lopez, TX SBN 24083414

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8 ATTORNEYS FOR

PLAINTIFF JANE DOE QLF 001

9 OF COUNSEL:

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